



Early Journal Content on JSTOR, Free to Anyone in the World

This article is one of nearly 500,000 scholarly works digitized and made freely available to everyone in the world by JSTOR.

Known as the Early Journal Content, this set of works include research articles, news, letters, and other writings published in more than 200 of the oldest leading academic journals. The works date from the mid-seventeenth to the early twentieth centuries.

We encourage people to read and share the Early Journal Content openly and to tell others that this resource exists. People may post this content online or redistribute in any way for non-commercial purposes.

Read more about Early Journal Content at <http://about.jstor.org/participate-jstor/individuals/early-journal-content>.

JSTOR is a digital library of academic journals, books, and primary source objects. JSTOR helps people discover, use, and build upon a wide range of content through a powerful research and teaching platform, and preserves this content for future generations. JSTOR is part of ITHAKA, a not-for-profit organization that also includes Ithaka S+R and Portico. For more information about JSTOR, please contact support@jstor.org.

day laborer was sent to a city to employ additional labor. He hired several laborers and was endeavoring to induce others to enter his service. Held, that he was not a labor agent, within Va. Code 1904, p. 2247, imposing a fine on one conducting the business of a labor agent without having first obtained a license therefor; the statute requiring a strict construction as against the state, because it imposes a tax and is intended to reach persons who for compensation conduct the business of employing laborers for others.

GLENN *v.* WEST.

Jan. 17, 1907.

[56 S. E. 143.]

Taxation—Tax Deed—Sale under Assessment to Trustee—Effect on Rights of Remaindermen.—Under Code 1887, § 465 (Va. Code 1904, p. 244), providing that all lands shall be assessed for taxation in the name of the person who has the freehold in possession, and section 661 (Va. Code 1904, p. 321), providing that the sale of delinquent lands to purchasers from the commonwealth shall not be so construed as to affect the title of the tenant in remainder to any real estate which has been sold on account of the default of the tenant for life in paying the taxes or levies assessed thereon, a deed of land sold for taxes assessed to a trustee holding land for a widow for life, with directions to convey it to her children at her death, accruing during the life of the widow, does not affect the title of the children or of those claiming under them.

[Ed. Note.—For cases in point, see Cent. Dig. vol. 45, Taxation, §§ 1463, 1551.]

SOUTHERN RY. CO. *v.* CLARK.

Jan. 31, 1907.

[56 S. E. 274.]

1. Railroads—Accident at Crossing—Evidence—Sufficiency.—In an action against a railroad company for injuries to plaintiff and his horse, received from a fall in riding across an alleged defective railroad crossing, evidence considered, and held, that the question of the defendant's negligence was for the jury.

2. Appeal—Review—Amount of Recovery—Damages.—The damages awarded to plaintiff for injuries to himself and horse from a fall while riding across an alleged defective railroad crossing, not being so great as to clearly indicate that the jury was actuated by partiality or prejudice, will not be set aside as excessive.

[Ed. Note.—For cases in point, see Cent. Dig. vol. 3, Appeal and Error, §§ 3944-3947.]